

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-50-GMS
	:	
WILLIE BROWN, et al.,	:	
	:	
Defendant.	:	

**GOVERNMENT'S REQUEST FOR SPECIAL VOIR DIRE**

**NOW COMES** the United States of America, by and through its attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and Douglas E. McCann and Beth Moskow-Schnoll, Assistant United States Attorneys, and hereby requests that the Court submit the following questions to the jury panel in the above-captioned case:

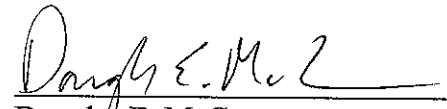
1. Do you know (witness list to be supplied)?
2. This case involves various narcotics charges. Is there anything about the nature of the charges that would prevent you from being an impartial juror?
3. Have you, or any close relative, ever been investigated by the Drug Enforcement Administration, the Internal Revenue Service, the Dover Police Department, Delaware Probation and Parole, or the Delaware State Police?
4. Would the fact that the DEA, IRS, Dover Police, Probation and Parole, or Delaware State Police were involved in the investigation in this case interfere with your ability to be fair and impartial?
5. Have you served on a jury for a criminal case or on a Grand Jury before?

6. Other than traffic offenses, have you or any members of your family ever been the subject of a criminal investigation and/or charged with a criminal offense?
7. Have you or any members of your family been charged with a drug crime?
8. Do you believe that drugs should be legalized?
9. Have you ever testified in a criminal case?
10. Do you have any difficulty hearing, particularly with the use of headphones?

Respectfully submitted,

COLM F. CONNOLLY  
United States Attorney

By:

  
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Douglas E. McCann  
Beth Moskow-Schnoll  
Assistant United States Attorneys

Dated: March 1, 2007

**IN THE UNITED STATES DISTRICT COURT  
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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**V.**

**WILLIE BROWN, ET AL**

**Defendant.**


**Case No. 06-50-GMS**

## CERTIFICATE OF SERVICE

I, Marie Steel, Legal Assistant in the Office of the United States Attorney for the District of Delaware, hereby certify that on the 1<sup>st</sup> day of March, 2007, I caused to be filed a Government's Request For Special Voir Dire with the Clerk of Court. I further certify that a copy of the foregoing was mailed via First Class Mail to counsel of record as follows:

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Marie Steel  
Legal Assistant